

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

William Edward Bell

Case: 2:23-mj-30379

Assigned To : Unassigned

Assign. Date : 9/18/2023

CMP: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 10, 2023, in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in Possession of a Firearm and Ammunition.


This criminal complaint is based on these facts:

See attached affidavit.

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: September 18, 2023City and state: Detroit, MI


Complainant's signature

Brett J. Brandon, Special Agent, ATF*Printed name and title*


Judge's signature

Elizabeth A. Stafford, United States Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT

I, Brett J. Brandon, being first duly sworn, hereby state:

1. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, United States Department of Justice, assigned to the Detroit Field Division since July 2013. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with ATF, I have conducted and/or participated in numerous criminal investigations focused on firearms, drug trafficking violations, and criminal street gangs.

2. I am currently assigned to the Pontiac Gun Violence Task Force (GVTF), a task force established by the Oakland County Sheriff's Office (OCSO) and ATF. The GVTF is tasked with investigating the unlawful possession of firearms and violent firearm crimes committed within the city of Pontiac. During my employment with ATF, I have conducted and/or participated in hundreds of criminal investigations involving the possession and use of firearms, drug trafficking violations, and criminal street gangs.

3. This affidavit is from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

4. ATF is currently conducting a criminal investigation concerning WILLIAM EDWARD BELL (DOB: XX/XX/1992) for violations of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm and Ammunition), among other state and federal criminal violations.

PROBABLE CAUSE

Criminal History and Background as to BELL

5. I reviewed BELL's computerized criminal history and Michigan's Sixth Judicial Circuit Court records, which revealed the below felony convictions.

- a. On August 13, 2008, BELL pleaded guilty to felony Carjacking and was sentenced to five (5) to twenty (20) years in prison.

b. On February 20, 2020, BELL pleaded guilty to felony Delivery/Manufacture Controlled Substance (Cocaine, Heroin or Another Narcotic) less than 50 Grams and Possession Controlled Substance (Cocaine, Heroin or Another Narcotic) less than 25 Grams, a crime punishable by more than one year in prison. On April 16, 2020, BELL was sentenced to an eighteen-month term of probation on the offense.

May 15, 2022 Shooting Involving BELL

6. On May 15, 2022, at approximately 8:00 p.m., M.W., a gunshot wound victim (later revealed to be the initial shooter) walked into a hospital in Pontiac, MI. M.W. had two gunshot wounds—one in his back and one near his right wrist—but claimed that he did not remember the shooting.

7. At approximately 8:36 p.m., the OCSO was dispatched to the area of Raeburn Street and Woodward Avenue for a report of shots fired. The caller reported they heard approximately fifteen (15) gunshots and saw a black Chevrolet Impala speed off approximately ten (10) minutes prior to calling 911. The caller also stated there was a

“balloon release” event in the area. The OCSO located and recovered eighteen (18) 9mm fired cartridge cases and three (3) .45 caliber fired cartridge cases.

8. The GVTF subsequently located M.W.’s white Dodge Ram truck, with apparent gunshot and accident damage, parked about a mile away in the driveway at 294 S. Marshall Street in Pontiac. The GVTF recovered three (3) 9mm fired cartridge cases and one (1) .45 caliber fired cartridge case in and around the vehicle.

9. The fired cartridge cases were sent to the lab and images of the casings were entered into the ATF’s National Integrated Ballistic Information Network (NIBIN), a national database containing digital images of fired cartridge cases recovered at crime scenes and test-fired from firearms recovered by law enforcement.

10. The lab reviewed the fired cartridge cases and advised five (5) 9mm firearms and two (2) .45 caliber firearms were used in the shooting.

11. On May 20, 2022, a concerned citizen, who wished to remain anonymous, provided information regarding the shooting to the GVTF. The citizen stated they witnessed the shooting on Raeburn Street and

knew who was involved. The citizen stated they were attending a balloon release memorial event for a deceased individual when M.V. and another individual known to the citizen drove by in a white truck and shot at BELL, aka “Blood,” and B.S. The citizen then watched BELL and B.S. return fire at the truck causing a window to shatter. The citizen said one of the people in the truck was shot and later went to the hospital to be treated for his injuries.

12. The GVTF also spoke to ATF Source of Information (ATF SOI-1) who was present at the shooting and observed the events. ATF SOI-1 identified M.W. as the driver of the truck and observed the front passenger shoot at a group of individuals. ATF SOI-1 saw seven (7) individuals with pistols during the shooting, including BELL, who was in possession of a mid-sized Glock pistol. (This is the same number of firearms the lab identified as being used in the shooting.) ATF SOI-1 observed the front passenger and three (3) other individuals firing their pistols during the shooting but did not see BELL shooting. ATF SOI-1 is cooperating with the government in the hopes of receiving a benefit on pending criminal charges.

July 31, 2023 Shooting Involving BEL

13. On July 31, 2023, Task Force Officer Bader screen recorded an Instagram story posted by Instagram User ID “lilantccg_” at approximately 2:00 am. I reviewed the video and observed a black male with dreadlocks wearing a white t-shirt, blue pants, and white shoes fanning out money while seated on top of a white SUV with a sunroof. The SUV was backed into a spot in the parking lot. I immediately recognized the Spring Lake Apartment complex based on prior investigations. Additionally, I noted a white sedan parked front end forward to the right of the SUV. The camera then panned to the left, and I observed BELL standing next to the front passenger door of the SUV wearing a light blue LA Dodgers t-shirt, light colored blue jeans, a black Brooklyn Nets hat, and black boxers (BELL’s jeans were sagging below his waist). BELL was fanning money and the cameraman said, “Oh yeah they got Blood whipping out guns and everything. Man them niggas ain’t fucking around.” I also observed what appeared to be a black pistol handle with an extended magazine protruding from the left front side of BELL’s waistband. The “U” shape and size of the floor

plate of the extended magazine was consistent with magazines accepted by Glock pistols. The way the magazine was seated in the handle of the firearm was also consistent with Glock pistols. A white mark toward the rear of the firearm was also consistent with the location of the rear sights on a Glock pistol. See below for a screen capture taken from the Instagram video and a zoomed-in version of the image (not altered or edited in any way).

Instagram Video Still



Zoomed-In Video Still



14. I am aware based on recorded jail calls, the anonymous concerned citizen, and ATF SOI-1, that BELL utilizes the nickname “Blood”. I am also aware of BELL’s appearance based off prior investigations and a review of BELL’s Michigan Secretary of State photograph dated April 22, 2023. I noted BELL has a distinct five-point star tattooed on his right cheek. See below side by side of a still image from the Instagram video and BELL’s Michigan Secretary of State photograph.

Instagram Video



Michigan Secretary of State



15. On July 31, 2023, at approximately 2:04 am, the OCSO responded to 168 Carriage Circle, located within the Spring Lake

Apartments, for a report of a large group of people fighting. While arriving on scene, the OCSO heard numerous gunshots nearby. A male victim who had been shot in the arm approached the OCSO. A deputy applied a tourniquet to the victim's arm. The victim returned to the above-referenced white SUV and was driven to the hospital. The OCSO observed gunshot damage to several apartments. At the time, the OCSO did not locate any additional victims or suspects.

16. The OCSO recovered twenty-six (26) 9mm fired cartridge cases from the parking lot of the apartment complex. The casings were sent to the lab and images of the casings were uploaded to NIBIN. A NIBIN lead identified the fired cartridge cases recovered at both the May 15, 2022 and June 31, 2023 non-fatal shootings scenes as likely having been fired by the same firearm. Furthermore, the lead indicated the cases exhibit an "elliptical" type firing pin impression and a rectangular type aperture impression (the aperture is the hole the firing pin passes through when a firearm is discharged). I am aware these markings are consistent with Glock pistols, Smith and Wesson Sigma series pistols, and Springfield Armory XDS9 pistols.

17. I obtained and reviewed surveillance video of the shooting. At approximately 1:54 am (camera time approximately fifteen minutes fast), I observed a white SUV with a sunroof arrive and back into a parking spot in the middle of the parking lot next to a white sedan parked facing forward. There were dozens of people on foot in the parking lot. At approximately 1:55 am (camera time), a person seated on top of the SUV appears to fan money. At least two (2) individuals were standing at the front passenger door of the SUV. This was consistent with the above-referenced Instagram video. At approximately 2:19 am (camera time), muzzle flashes can be seen in the south end of the parking lot between two (2) vehicles. Immediately thereafter, three (3) males who were standing near the white SUV with a sunroof returned fire with what appeared to be pistols.

18. One of the three (3) males who returned fire was wearing a light-colored t-shirt, light colored pants, white shoes, and black boxers/underwear. This individual ran to the driver's side of the SUV and began shooting toward the southwest end of the parking lot. I noted this individual was not as tall as the SUV. I also noted the t-shirt, pants, and boxers appeared to be consistent with the clothing

BELL was wearing in the Instagram video described above. Individual 2's height is consistent with BELL, who is listed as 5'6" on his computerized criminal history.

August 14, 2023 Shooting of BELL

19. On August 14, 2023, BELL was non-fatally shot in left hand while in the parking lot of 339 W. Walton Boulevard in Pontiac, Michigan. The OCSO and GVTF investigated the shooting and recovered approximately fifty (50) 9mm and .40 caliber fired cartridge cases from the scene. While canvassing the area, I located a trail of blood from the parking lot to a nearby business where surveillance video showed BELL was picked up and transported to McLaren Oakland Hospital. While tracking the blood trail, I located a black Brooklyn Nets hat consistent with the one BELL wore in the above-referenced July 31, 2023 Instagram video. While at the hospital, BELL refused to cooperate with law enforcement.

Federal Search Warrant

20. On August 16, 2023, BELL called Task Force Officer Bader from a cell telephone ending in "2169" (BELL's Cell Phone). BELL reiterated his wish not to pursue charges or cooperate with law

enforcement. Task Force Officer Bader queried a law enforcement database for the Target Cellular Device and identified the carrier as Metro-PCS (T-Mobile) and the subscriber as WILLIAM BELL.

21. On August 23, 2023, I swore to and obtained a sealed federal search warrant for a pen register/trap and trace, E-911 and geolocation information and call detail records associated with BELL's Cell Phone from United States Magistrate Jude Anthony P. Patti. On that same date, ATF served the federal search warrant to T-Mobile.

22. On August 24, 2023, the GVTF began receiving "pings" for BELL's Cell Phone from T-Mobile.

23. On August 25, 2023, the GVTF received the call detail records associated with BELL's Cell Phone.

24. ATF Intelligence Research Specialist Michael Malone analyzed the records which placed BELL's Cell Phone in the area of the July 31, 2023 shooting involving BELL and the August 14, 2023 non-fatal shooting of BELL.

25. The GVTF attempted to locate BELL utilizing the "pings" and pen register from August 24, 2023, to present without success.

September 10, 2023 Shooting Involving BELL

26. On September 8, 2023, Task Force Officer Nathaniel Rogers informed me of a Facebook post by D.S. which contained three images of BELL. I reviewed the images and observed BELL wearing light-colored blue jeans, a black “Betty Boop” cartoon t-shirt, black reflective shoes, and a black hat (worn backwards) with his left hand in a beige medical wrap/soft cast (from the August 14, 2023 shooting). See below for a screen capture of one of the images. The image is cropped to protect the identity and privacy of D.S.



27. D.S. added the following caption to social media post, “Bro want me to TRAP, he don’t want me sliding he gone pop em 4 me! [black

heart emoji] [fingers crossed emoji] [red blood emoji]” I am aware based on training experience investigating shootings, the criminal possession and use of firearms, and criminal street gangs, including the bloods, that the phrases “sliding” and “pop” refer to using a firearm to shoot someone. Additionally, the red blood emoji is frequently used to represent the bloods criminal street gang.

28. On September 10, 2023 at approximately 1:47 am, the OCSO, while on a separate call for service in the area of Nelson Street, heard multiple shots fired to the west of their location. Shortly thereafter, multiple individuals called 911 and reported a shooting at the Exotic Hookah lounge located at 671 Baldwin Avenue in Pontiac, Michigan. The OCSO responded and spoke to the owner, who stated that a fight broke out inside the lounge and spilled out into the parking lot, shortly before the shooting. The incident was captured on surveillance video.

29. The OCSO conducted an initial review of the surveillance footage while on scene and observed two (2) black males shooting from the sidewalk of the business. The OCSO recovered fourteen (14) 9mm fired cartridge cases from the sidewalk and parking lot of the business

and two (2) 9mm fired cartridge cases were also recovered on Baldwin Avenue. The OCSO also observed and documented gunshot damage to two (2) vehicles parked in the parking lot.

30. On September 11, 2023, the GVTF began investigating the shooting and obtained additional surveillance video. I reviewed the surveillance video which showed D.S. and another black male in a black tracksuit (Individual 1) get into an altercation inside the business. Once outside, the black male in the black track suit shoved a black male in a white long-sleeve shirt with a red heart on the sleeve (Individual 2). Individual 2 then retrieved a pistol and ran away from the Hookah Lounge, toward Baldwin Avenue. Immediately thereafter, Individual 1 retrieved a pistol and began firing at Individual 2 who was running south on Baldwin Avenue. Individual 1 and Individual 2 then exchanged gunfire. At that time, BELL, armed with a black pistol, crouched down behind a red SUV, took aim, and fired three (3) shots in the direction of Individual 2. I noted the pistol appears to be a Glock pistol based on the overall size and shape of the firearm and most identifiably the slide and trigger guard. I also noted BELL was wearing the same light-colored blue jeans, a black “Betty Boop” cartoon t-shirt,

black reflective shoes, and a black hat (worn backwards) with his left hand in a beige medical wrap/soft cast. See below screen captures from the surveillance video.



31. On September 11, 2023, the GVTF received a NIBIN lead indicating three (3) of the 9mm fired cartridges recovered from the September 10, 2023 shooting at the Exotic Hookah Lounge were likely fired from the same firearm used in the May 15, 2022 and July 31, 2023 non-fatal shootings scenes. The lab identified two (2) of the fired cartridge cases as manufactured by Sig Sauer and one (1) as manufactured by Federal Ammunition.

Interstate Nexus

32. On January 23, 2023, I spoke to ATF Interstate Nexus Expert and Special Agent Kara Klupacs. I provided Special Agent Klupacs with a verbal description of the three (3) fired cartridge cases recovered from the September 10, 2023 shooting scene. Based upon the verbal description, Special Agent Klupacs advised that the ammunition qualified as ammunition as defined under 18 U.S.C. § 921 and was manufactured outside of the state of Michigan after 1898, and therefore had traveled in and affected interstate commerce.

CONCLUSION

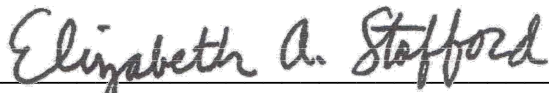
33. Probable cause exists that WILLIAM EDWARD BELL, a convicted felon aware of his felony convictions, did knowingly and intentionally possess Sig Sauer and Federal ammunition that traveled in or affected, interstate or foreign commerce.

Respectfully submitted,



Brett J. Brandon
ATF Special Agent

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HONORABLE ELIZABETH A. STAFFORD
UNITED STATES MAGISTRATE JUDGE

Dated: September 18, 2023